

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

FREE SPEECH COALITION, INC, et.	§	
al.,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	Civil Action No. 1:23-cv-00917-DAE
	§	
ANGELA COLMENERO, in her	§	
official capacity as Interim Attorney	§	
General for the State of Texas,	§	
	§	
<i>Defendant.</i>	§	

**DEFENDANT’S OPPOSED MOTION FOR EXTENSION OF TIME TO FILE
RESPONSIVE PLEADING**

Angela Colmenero, in her official capacity as Provisional Attorney General for the State of Texas, (“Colmenero”) submits this motion to request that her deadline to file a response to Plaintiffs’ Motion for Expedited Preliminary Injunction, which is currently due on August 14, 2023, be extended to August 21, 2023. A brief timeline may be helpful.

Monday – June 12, 2023	Governor Abbott signs HB 1181 into law
Friday – August 4, 2023	Plaintiffs file their Original Complaint and Motion for Expedited Preliminary Injunction
Monday – August 7, 2023	The Office of the Attorney General processes and assigns the case to undersigned counsel
Tuesday – August 8, 2023 ¹	Court orders Defendant’s response due on Monday, August 14, 2023

This suit having been filed on Friday, August 4, 2023, Colmenero acknowledges that any extension of time given will push the parties and this Court closer toward September 1—the effective

¹ On this date, undersigned counsel conducted a full-day deposition in *Hermes-Eads v. HHSC*, Cause No. 2020-DCV-4193 in County Court at Law No. 3, El Paso County.

date of the statute. But Colmenero requests the extension nonetheless so that she may have adequate time to prepare a proper response to aid the Court in its determination.

Respectfully submitted,

ANGELA COLMENERO
Provisional Attorney General of Texas

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First Assistant Attorney General

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COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2023, a true and correct copy of the foregoing document was served via the Court's electronic filing system to all counsel of record.

A handwritten signature in blue ink, appearing to read 'J. Ramsey', is written over a horizontal line.

JOHN RAMSEY
Assistant Attorney General

CERTIFICATE OF CONFERENCE

I hereby certify that on August 9, 2023, I made a good faith attempt to confer with opposing counsel on this motion. I emailed Scott Cole at 10:32am to ask if he opposed an extension. At approximately 2:30pm, I tried to reach him by phone by calling the number listed on Plaintiffs' motion, the direct line number listed on his firm's website, his firm's general line, and the number listed on Plaintiffs' complaint (where I left him a message). In the short time between my attempts to reach Mr. Cole and the filing of this motion, we were unable to confer. If that changes, I will update the Court.

A handwritten signature in blue ink, appearing to read 'J. Ramsey', is written over a horizontal line.

JOHN RAMSEY
Assistant Attorney General